

EXHIBIT 15

From: David J. Rosen <DRosen@kvn.com>
Sent: Wednesday, October 21, 2015 4:54 PM
To: Peter Klivans
Cc: Cisco-Arista; 'Cisco-AristaCopyrightTeam@kirkland.com' (Cisco-AristaCopyrightTeam@kirkland.com); ARISTA-KVN
Subject: RE: Cisco v. Arista

Peter,

Arista is available to depose Mr. Bettadapur on November 6 in the Bay Area. But as we've discussed, Arista needs to review Mr. Bettadapur's and Mr. Tjong's documents, as well as the non-custodial patent documents, before we can determine whether we will proceed with depositions of all the '886 and '526 inventors. As soon as we receive and review those documents, we will make that determination and confirm Mr. Bettadapur's deposition date, if appropriate.

In light of Cisco's discovery last week that it no longer has custodial documents for Mr. Bansal, and because Mr. Bettadapur's proposed deposition date is now over two weeks away, we would like to add the following prior-art search terms for the '886 patent. These terms can be limited to the following date range: January 1, 2003 to July 8, 2005.

- ("patent" near30 "Shafer") or "network router management interface" or "2002/0191619" or "0191619"
- ("patent" near30 "Courtney") or "modeling a network device's configuration" or "09/942,833" or "942,833"
- "junoscript"
- "Menten" near20 "XML"

As for Mr. Wheeler, we certainly remain interested in deposing him. While we await further information about his availability, we ask that you run the following prior-art search terms for the inventors of the '526 patent. These terms can be limited to the following date range: January 1, 1999 to June 28, 2000.

- ("patent" near30 "Fehskens") or "5,832,224" or "5832224" or "604,880" or "08/663,620" or "663,620" or "Entity Management System"
- ("patent" near30 "Gillis") or "7,047,526" or "7047526" or "604,880" or "09/604,880" or "generic command interface"
- "Martinez-Guerra" or "6,523,172" or "6523172" or "10/960,218" or "960,218" or "command script parsing"
- ("patent" near30 "Chen") or "6,724,408" or "6724408" or "09/371,447" or "371,447" or "command line interface for a data processing system"
- "HomeConnect" near30 (pars! or program! or "input" or "CLI" or "command" or "tree" or "token")
- "SuperStack" near30 (pars! or program! or "input" or "CLI" or "command" or "tree" or "token")
- "Audix" near30 (pars! or program! or "input" or "CLI" or "command" or "tree" or "token")
- "Junos" near30 (pars! or program! or "input" or "CLI" or "command" or "tree" or "token")

Regards,
David

David J. Rosen
Attorney at Law

KEKER & VAN NEST LLP

415 676 2236 direct | [vCard](#) | drosen@kvn.com
 633 Battery Street, San Francisco, CA 94111-1809 | 415 391 5400 main | [kvn.com](#)

From: Peter Klivans [mailto:peterklivans@quinnmanuel.com]
Sent: Wednesday, October 21, 2015 2:39 PM
To: Elizabeth K. McCloskey
Cc: Cisco-Arista; 'Cisco-AristaCopyrightTeam@kirkland.com' (Cisco-AristaCopyrightTeam@kirkland.com); ARISTA-KVN
Subject: RE: Cisco v. Arista

Lizzy,

As I mentioned yesterday and you note below, we expect Mr. Bettadapur's custodian documents to be going out later today. In addition, Mr. Bettadapur is available for deposition on November 6 in the Bay Area. Also, please note that Mr. Wheeler is unavailable for deposition at least through next week due to a personal issue. We are still checking on other witnesses. Please confirm the date for Mr. Bettadapur as soon as possible.

Regards,
 Peter

From: Elizabeth K. McCloskey [<mailto:EMcCloskey@kvn.com>]
Sent: Tuesday, October 20, 2015 9:15 PM
To: Peter Klivans <peterklivans@quinnmanuel.com>
Cc: Cisco-Arista <Cisco-Arista@quinnmanuel.com>; 'Cisco-AristaCopyrightTeam@kirkland.com' (Cisco-AristaCopyrightTeam@kirkland.com) <Cisco-AristaCopyrightTeam@kirkland.com>; ARISTA-KVN <ARISTA-KVN@kvn.com>
Subject: Cisco v. Arista

Peter,

I write to memorialize today's meet and confer discussion. We look forward to conferring on Friday regarding the parties' requests for production, and then again, as soon as Cisco is prepared, regarding the parties' proposed search terms.

Cisco intends to produce Mr. Bettadapur's custodial documents tomorrow, and to produce Mr. Tjong's documents and non-custodial patent documents by the end of this week. The first production will include about 10,000 documents, and the second will include between 5,000-6,000.

You represented that, because Cisco has not yet produced Mr. Bettadapur's documents or the non-custodial patent documents, Mr. Bettadapur's deposition cannot proceed on October 23. Subject to its planned production of documents, Cisco intends to propose dates for Mr. Bettadapur's deposition either at the end of the week of October 26 or the beginning of the week of November 2.

We explained that we need more information about Cisco's repositories for non-custodial patent documents. You agreed to follow up with us no later than Friday to provide information about those repositories, to the extent you do not believe such information is protected by the work-product privilege.

You also stated that Cisco intends to provide dates for Mr. Lougheed's deposition at some time after the date Arista proposed, November 10.

Finally, I note that we are awaiting responses from Cisco regarding Arista's Interrogatory Nos. 9, 10, 13, 14 and 18, as reflected in Arista's email correspondence of October 19. Please follow up with us on those requests.

Thanks,
Lizzy

Elizabeth K. McCloskey

Attorney at Law

KEKER & VAN NEST LLP

415 676 2269 direct | [vCard](#) | emccloskey@kvn.com
633 Battery Street, San Francisco, CA 94111-1809 | 415 391 5400 main | kvn.com